REMARKS

Claims 6-8 and 17-26 are pending in the present application, with claims 6, 7, 17 and 22 being independent. Favorable reconsideration and allowance of the subject application are respectfully requested.

Claim Rejections Under 35 U.S.C. §112

The Examiner rejected claims 23-26 under 35 U.S.C. §112, first paragraph, for failing to comply with the enablement requirement. This rejection is respectfully traversed.

The specification is replete with language describing the use of different types of image data such as RGB, XYZ and CMY. The Examiner's attention is directed to the last paragraph on page 30 for an example. It is immediately clear to a person skilled in the art that such formats represent the color intensity or in other words color magnitude of three colors, e.g., Red (R), Green (G) and Blue (B). Consequently, a person skilled in the art would, based on the specification, be fully enabled to use the invention of claims 23 through 26. Applicants submit that the specification provides considerable direction and guidance to a skilled person and that there was a high level of skill in the art at the time the application was filed. All methods needed to practice the invention were well known. (In re Wands, 858 F.2d 731, 740, 8 USPQ2d 1400, 1406 (Fed. Cir. 1988)).

In view of the above, the Examiner has not met his burden to show that the specification would not have taught one skilled in the art how to make and/or use the full scope of the invention as claimed in claims 23-26 without undue experimentation. (In re Wright, 999 F.2d 1557,1562, 27 USPQ2d 1510, 1513 (Fed. Cir. 1993)).

Reconsideration and withdrawal of the rejection is respectfully requested.

The Examiner has also rejected claim 21 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Examiner states that claim 21 claims "a repairing method", but does not specify the method.

Applicants respectfully submit that claim 21 recites a further feature of the "Identifier" recited in apparatus claim 17. The Identifier is used to identify a particular restoring method, as recited in claim 17 and a repairing method, recited in claim 17. The restoring method and repairing method are not exact and will vary depending on other aspects of the invention. Thus, the necessity of the Identifier to identify the appropriate repairing method. For example, applicants would like to point out that the repairing method will most likely depend on the compression method used by the compressor of claim 17. The compression method used by the compressor, and consequently the restoring method and the repairing method

identified by the identifier and to be used by the restoring means 28 (see e.g. Fig. 25), are conventional techniques that are used by the invention in combination with other elements. An example is mentioned in the specification on page 36, lines 11-18. Page 37, lines 4-8, of the specification describes how the identifier is used to identify a conventional restoring and repairing method. Page 38, lines 5-9, describes how the method is adaptable to the compressing method, with the identifier indicating the restoring and repairing method. Withdrawal of the rejection is respectfully requested.

Claim Rejections Under 35 U.S.C. §103

The Examiner has rejected claims 6-8 and 17-26 under U.S.C. 103(a) as being unpatentable over D'Errico (U.S. patent 4,992,861), and further in view of Adams et al. (U.S. patent 5,926,647). The rejections are respectfully traversed.

Independent claim 6

In the outstanding Office Action, the Examiner alleges that D'Errico teaches compression of a multidimensional lookup table. In support of this the Examiner refers to col. 2, lines 27-34, where D'Errico suggests reduction of the storage space required by the lookup table through reduction of the amount of data used to define

a given color space and to provide on-line digital processing that linearly interpolates between adjacent data points of the lookup table. Applicants respectfully disagree.

What D'Errico is describing is the rather trivial fact that it is possible to describe something (in this case a color space) through the use of less data than what would otherwise be optimal, and thus use less storage space, and that it is possible to smoothen the resulting errors through the use of interpolation. D'Errico's method merely reduces the amount of data that is necessary when creating a matrix. This is accomplished using interpolation and an at least squares algorithm.

Applicants respectfully submit that this is not only different from the use of compression and subsequent restoration, but that D'Errico actually resigns to the problem of having less data available and instead attempts at obtaining an unbiased error. In other words, D'Errico does not reduce the amount of data in order to regain it later. Rather, D'Errico accepts the errors introduced by starting out with less data in the first place, and only attempts at changing from a negative average error to a zero average error (col. 2, lines 42-60). D'Errico never suggests reducing the amount of recorded table values, through compression or otherwise, only record fewer values and then alter them from the exact image values in order to achieve an average error of zero (col. 2, lines 58-60).

Consequently, nothing in D'Errico suggests to the skilled person that a compression method can be incorporated into the teachings of that reference.

Furthermore, the Examiner refers to Adams' teaching of a technique for dynamic alteration of a color look-up table pallet identifier in response to one or more key codes placed in an input data stream, and of three alternative methods for avoiding conflict between simultaneously running applications that may attempt to use a resource (a graphics accelerator) at the same time.

The table pallet identifier, as the name implies, identifies a pallet, not a method for restoring a compressed table, and the changing of such an identifier in response to key codes placed in an input data stream bears no relation to the teachings of the present invention. Further, the identification of a pallet as taught in Adams, bears no resemblance nor does it teach reducing a capacity of a table by a combination of the point, the compression and number of the division of the table. Thus, Adams does not teach or suggest the features of applicants claimed embodiments.

It is unclear to Applicants which one of the three methods Adams describes for handling simultaneously running applications and their access to shared resources the Examiner believes can be incorporated into D'Errico. Applicants respectfully submit that neither saving and restoring the state of an interrupted application, allowing only one application to use the resource, nor using a software semaphore has any relevance to the present invention. If the Examiner is of the opinion that the suggested use of a software semaphore reads on the use of an

identifier for a restoration method, Applicants would like to point out that a software semaphore is a flag used in multitasking in order to prevent interruption of the blocking program (the program that set the semaphore) as long as that program is using the resource.

Based on the above discussion it should be clear that D'Errico and Adams, alone or in combination, fail to teach the features of "multidimensional lookup table compression means for compressing said multidimensional lookup table," and inclusion of an "identifier, which identifies a restoring method for restoring the compressed multidimensional lookup table" in color characteristic data. Withdrawal of the rejection is respectfully requested.

Independent claims 7, 17 and 22

The features of claim 6 discussed above are, with minor variations, also present in claims 7, 17 and 22. The same arguments apply, and the claim should be allowable for the same reasons.

Dependent claims

The dependent claims 8, 18-21 and 23-26 should be considered allowable at least for depending from an allowable base claim. Withdrawal of the rejections is respectfully requested.

Conclusion

In view of the above amendments and remarks, this application appears to be in condition for allowance and the Examiner is, therefore, requested to reexamine the application and pass the claims to issue.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at telephone number (703) 205-8000, which is located in the Washington, DC area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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